

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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H. CRISTINA CHEN-OSTER; SHANNA	:
ORLICH; ALLISON GAMBA; and MARY DE	:
LUIS,	:
	:
Plaintiffs,	:
	:
v.	:
	:
GOLDMAN, SACHS & CO. and GOLDMAN	:
SACHS & CO. LLC,	:
	:
Defendants.	:
	:
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DECLARATION OF ROBERT J. GIUFFRA, JR.

I, Robert J. Giuffra, Jr., pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury as follows:

1. I am a partner of Sullivan & Cromwell LLP, attorneys for Defendants in this action, and of the Bar of the State of New York. I make this Declaration in order to place before this Court certain documents referenced in Defendants' Responses to Plaintiffs' Objections to Magistrate Judge Lehrburger's Order Denying Discovery of Privileged Compensation Analysis.

2. Attached hereto are true and correct copies of the following:

Excerpts from the Transcript of the November 16, 2020 Deposition of Lloyd Blankfein

November 13–17, 2020 Email Chain between Joshua S. Levy and Michael Levin-Gesundheit Exhibit 2

Excerpts from the Transcript of the November 13, 2020 Deposition of Erika Irish Brown

Executed on January 7, 2021 in New York, New York.

/s/ Robert J. Giuffra, Jr.

Robert J. Giuffra, Jr.